

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BEGASHAW AYELE,

Plaintiff,

v.

COGNISA SECURITY COMPANY, INC.,

Defendant.

FILED  
2005 FEB -3 P 3:27

U.S. DISTRICT COURT  
DISTRICT OF MASS.

Civil Action No.: 04CV12217-PBS

**JOINT STATEMENT PURSUANT TO FED. R. CIV. P. 26(f) AND LOCAL RULE 16.1(d)**

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1(d), the parties have conferred to discuss, among other things: (a) preparing an agenda of matters to be discussed at the scheduling conference; (b) preparing a proposed pre-trial schedule and discovery plan; and (c) considering whether the parties will consent to a trial by a Magistrate Judge. Plaintiff Begashaw Ayele ("Ayele") and Defendant Cognisa Security, Inc. (incorrectly identified in Plaintiff's Complaint as "Cognisa Security Company, Inc." hereinafter "Defendant" or "Cognisa") jointly submit this statement.

**1. Proposed Schedule for Filing of Motions and Discovery Plan.**

- A. Deadline for completing fact discovery: May 31, 2005.
- B. Exchange of initial expert reports: (1) Plaintiff: June 30, 2005.  
(2) Defendant: July 29, 2005.
- C. Deadline for expert depositions: August 31, 2005.
- D. Deadline for dispositive motions: September 30, 2005.

The parties agree that they will not exceed the discovery event limitations specified in Local Rule 26.1(C).

**2. Certification.**

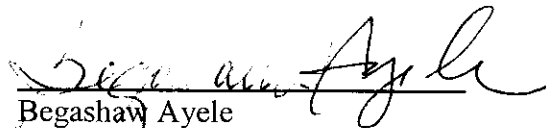
The parties and their counsel have conferred pursuant to Local Rule 16.1(d)(3): (a) with a view to establishing a budget for the cost of conducting the full course -- and various alternative courses -- of the litigation; and (b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4. The parties will file their certifications under separate cover.

BEGASHAW AYELE,

COGNISA SECURITY, INC.

*Pro se,*

By its attorneys,



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Dated: January 28, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that on February 3, 2005, a true copy of the above document was served by first class mail upon Plaintiff addressed as follows:

Begashaw Ayele  
261 O'Callaghan Way #816  
South Boston, MA 02127

  
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Bronwyn L. Roberts